

LAW OFFICES

ROBERT AARON GREENBERG

89 N. HADDON AVENUE
HADDONFIELD, NEW JERSEY 08033



CERTIFIED BY SUPREME COURT OF NJ
AS CIVIL & CRIMINAL TRIAL ATTORNEY

(609) 795-0900

FAX (609) 795-6767

MEMBER NJ & PA BAR

November 7, 1995

Joseph Cosentino, OSC
Removal Action Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Avenue
Edison, N.J. 08837

Re: Bayonne Barrel & Drum, Superfund Site, 150-154
Raymond Boulevard, Newark, Essex County, New Jersey

Dear Mr. Cosentino:

Pursuant to the United States Environmental Protection Agency - Region II letter dated September 28, 1995, enclosed please find the certified responses of Lightman Drum Company, Inc. with reference to the Bayonne Barrel & Drum Site in Newark, Essex County, New Jersey.

Please feel free to call upon this office at any time should you require additional information.

Thank you for your attention and consideration.

Very truly yours,


ROBERT AARON GREENBERG

RAG/dm

cc: Jerome Lightman
Marc Seidenberg, Esquire
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
290 Broadway, 17th Floor
New York, New York 10007

490923



1. a) Lightman Drum Company, Inc., d/b/a United Cooperage Corporation.

b) Corporation, New Jersey

c) President, Jerome Lightman

d) None.

e) N/A

f) N/A

2. a) Yes.

i. Lightman Drum Company, Inc. (LDC) sold used, empty steel drums to Bayonne Barrel (BB).

ii. No contracts or written agreements existed.

iii. From 1972 to the present LDC bought and sold used and reconditioned steel drums.

iv. LDC - RCRA number NJD 014743678 was located in Philadelphia, Pa. until 1974 and thereafter at Route 73 Cedar Brook, N.J. 08108.

b)

i. All records concerning the business activities of LDC during the period business was transacted with BB are in the possession of Robert Aaron Greenberg, Esq., in connection with other litigation.

ii. Same as answer to 2 (b)(i).

iii. LDC mostly sold open head drums to BB, although closed head drums were also sold.

iv. Used steel drums were mostly sold to BB, however, sometimes reconditioned drums were brought back.

v. Unknown.

1. Unknown.

2. None existed.

vi.

1. LDC contends that drums sold to BB were empty. The previous contents from LDC's customers are not known.

- a. Unknown.
- b. None.

vii. None

viii. Same as answer to 2(b)(1).

ix. Jerome Lightman

x. N/A

3. None.

4. Jerome Lightman answered all questions.

5. All insurance policies are in the possession of Robert Aaron Greenberg, Esquire. LDC has filed suit against Imperial Casualty & Indemnity Company, Merchants Insurance Group, Fireman's Fund Insurance Company, Continental Casualty Company and Guaranty National Insurance Company in a declaratory judgment action in New Jersey Superior Court seeking indemnity and defense coverage.

6. No such agreements exist.

7. None are known to this party.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey
County of Camden

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Jerome Lightman
NAME (print or type)

President
TITLE (print or type)

Jerome Lightman
SIGNATURE

Sworn to me before this

31st day of October, 1995

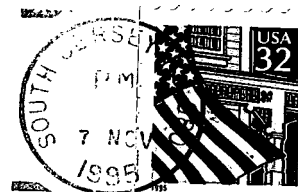
Anita J. Van Gemert
Notary Public

LAW OFFICES

ROBERT AARON GREENBERG

89 N. HADDON AVENUE

HADDONFIELD, NEW JERSEY 08033



Joseph Cosentino, OSC
Removal Action Branch
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region II
2890 Woodbridge Avenue
Edison, N.J. 08837

08837-3602 42

